

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of )  
 )  
Interconnection Between Local ) CC Docket No. 95-185  
Exchange Carriers and Commercial )  
Mobile Radio Service Providers )

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COMMENTS OF AMERITECH IN SUPPORT OF  
GTE'S MOTION FOR EXTENSION OF TIME

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The Ameritech Operating Companies<sup>1</sup> ("Ameritech") respectfully offer the following comments in support of GTE Service Corporation's ("GTE") February 5, 1996 Motion for Extension of Time to file initial and reply comments on the Commission's Notice of Proposed Rulemaking released in this docket on January 11, 1996 ("NPRM").

In that NPRM, the Commission generally examines a wide range of important issues having to do with interconnection arrangements between local exchange carriers ("LECs") and commercial mobile radio service ("CMRS") providers. More specifically, the Commission solicits comment on

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<sup>1</sup> The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company and Wisconsin Bell, Inc.

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several alternative pricing options for interconnection arrangements. In particular, the Commission seeks comment on its tentative conclusion "that, at least for an interim period, interconnection rates for local switching facilities and connections to end users should be priced on a 'bill and keep' basis (*i.e.*, both the LEC and the CMRS provider charge a rate of zero for the termination of traffic), and that rates for dedicated transmission facilities connecting LEC and CMRS networks should be set based on existing access charges for similar transmission facilities."<sup>2</sup>

Comments on these issues are due on February 26, 1996 and reply comments are due on March 12, 1996. GTE explained in its motion that it needs additional time to adequately prepare its submission. GTE asks the Commission to grant a one month extension, with initial comments due on March 26 and replies due on April 26, 1996.

Ameritech supports GTE's request for two main reasons. First, and as GTE points out,<sup>3</sup> Sections 251 and 252 of the recently enacted Telecommunications Act of 1996 (the "Act") establish new interconnection requirements which undoubtedly will affect LEC-CMRS interconnection proposals under consideration in the NPRM. Indeed, the mandates of the Act are not limited to interconnection between LECs and CMRS providers, but

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<sup>2</sup> NPRM at par. 3.

<sup>3</sup> GTE Motion at 2.

will govern the interconnection requirements between LECs and a wide variety of other providers. Thus, for example, the Commission's decision on whether to finally adopt its tentative conclusions in the NPRM about a "bill and keep" arrangement between LECs and CMRS providers must reflect consideration of the LECs' interconnection arrangements with other providers under the Act. If the Commission gives these interconnecting entities a modest amount of additional time to analyze those implications, it will greatly enhance the quality of the comments they submit in this docket and, accordingly, enhance the quality of the Commission's ultimate decision.

Second, Ameritech currently is negotiating several interconnection agreements which, when completed, would be relevant to the Commission's analyses in this case. The extension of time GTE seeks could well be sufficient for these negotiations to be completed. The Commission should give the market this opportunity to produce an interconnection arrangement because it would be prudent for the Commission to consider the product of voluntary negotiations when deciding what interconnection requirements will advance the public interest.

Ameritech appreciates that the Commission does not routinely grant extensions of time in which to file comments in rulemaking dockets. However, there are reasonable grounds to do so in this docket. Accordingly, Ameritech supports GTE's Motion for Extension of Time and urges the

Commission to extend the comment cycle in this docket to March 26 and  
April 26, 1996.

Respectfully submitted,

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February 12, 1996

CERTIFICATE OF SERVICE

I, Todd H. Bond do hereby certify that a copy of the foregoing  
COMMENTS OF AMERITECH IS SUPPORT OF GTE'S MOTION FOR  
EXTENSION OF TIME has been served on the parties listed below, via first  
class mail, postage prepaid, on this 12th day of February 1996.

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